

1 JERI COPPA-KNUDSON, Trustee  
2 3495 LAKESIDE DRIVE, PMB #62  
3 RENO, NV. 89509-4841  
4 (775) 329-1528

5 **UNITED STATES BANKRUPTCY COURT**  
6 **DISTRICT OF NEVADA**

7 IN RE: **CASE NO.BK-N-10-51699**  
8 **BACA-ESPINOSA, JOSE**  
9 **BACA, DINORA** **CHAPTER 7**

10 **MOTION AND NOTICE FOR ORDER**  
11 **EXTENDING TIME TO OBJECT TO**  
12 **THE ENTRY OF THE DISCHARGE**

13 Negative Notice/No Hearing Required

14 Debtor(s). \_\_\_\_\_ /

15 **TO THE DEBTOR (S) AND DEBTOR'S COUNSEL:**

16 **PLEASE TAKE NOTICE THAT:** The Trustee in the above-captioned case, Jeri Coppa-  
17 Knudson, and the Office of the United States Trustee hereby respectfully requests an extension of  
18 time in which to file an objection to Entry of Discharge.

19 **POINTS AND AUTHORITIES**

20 **A. Statement of Relevant Facts:**

21 1. The Debtor(s) commenced this proceeding by filing a voluntary petition under  
22 Chapter 7 on May 5, 2010.

23 2. The meeting of creditors in this proceeding, pursuant to 11 U.S.C. Section 341 and  
24 Federal Rule of Bankruptcy Procedure 2003(a) was concluded on October 14, 2010.

25 3. **[X] The debtors are to provide a copy of their filed 2010 income tax return to the**  
26 **Trustee.**

27 **///**

28 **///**

**///**

1 **B. Objection to the Discharge of the Debtor(s):**

2 The Trustee is informed and believes that the last day for filing objections to the Discharge  
3 of the Debtor(s) under 11 U.S.C. Section 727 and pursuant to F.R.B.P. 4004 is November 9, 2010  
4 and that a request for an extension of that deadline must be made before said date. The Trustee  
5 believes an extension of the time in which she may object to the Discharge of the Debtor(s) will be  
6 necessary. At this time, the Trustee believes she will not be able to obtain sufficient information  
7 from the Debtor(s) to make a determination as to the propriety of objecting to the Discharge of the  
8 Debtor(s) until the debtors tax return is reviewed. The Trustee therefore requests an extension of  
9 the deadline for filing a complaint objection to the Discharge of the Debtor(s) for filing objections  
10 to the Discharge, to-wit: **June 30, 2011.**

11 **WHEREFORE**, it is respectfully requested that the Court grant an extension of the  
12 deadline for filing a complaint objecting to the Discharge of the Debtor(s).

13 **NOTICE OF OPPORTUNITY TO OBJECT AND FOR HEARING:** Pursuant to  
14 **LR 9014.1**, the court will consider this motion, objection, or other matter without further  
15 notice of hearing unless a party in interest files an objection within 21 days from the date of  
16 service of this paper. If you object to the relief requested in this paper, you may file your  
17 objection at the bankruptcy clerk's office located in Reno, Nv. at the United States  
18 Bankruptcy Court, 300 Booth Street, Reno, Nv. 89509, and serve a copy on the movant's  
19 attorney and any other appropriate persons.

20 **It is the duty of the objecting party to timely set the objection for a hearing and**  
21 **properly notice all parties in interest. If you do not file an objection within the time**  
22 **permitted, an order granting the requested relief may be entered by the court without further**  
23 **notice or hearing.**

24 Dated this 1<sup>st</sup> day of November 2010.

25  
26 /s/ Jeri Coppa-Knudson

27 **JERI COPPA-KNUDSON, Trustee**  
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**CASE NO. BK- N-10-51699**

**BACA-ESPINOSA, JOSE**

**CHAPTER 7**

**BACA, DINORA**

**CERTIFICATE OF SERVICE**

1. On November 1 2010, I served the following document(s):  
MOTION AND NOTICE FOR ORDER EXTENDING TIME TO OBJECT TO THE ENTRY  
OF THE DISCHARGE

2. I served the above-named document(s) by the following means to the persons as listed below

☐ A. ECF System

☐ B. United States mail, postage fully prepaid

BACA-ESPINOSA, JOSE BACA, DINORA 1620 STERLING WY. RENO NV 89512

☐ C. Personal Service

☐ For a party represented by an attorney, delivery was made by handling the document(s) to the attorney or by leaving the documents(s) at the attorney's office with a clerk or other person in charge, or if no one is in charge by leaving the document(s) in a conspicuous place in the office.

☐ For a party, delivery was made by handling the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there.

☐ D. By direct email (as opposed to through the ECF System)

Based upon the written agreement of the parties to accept service by email or a court order. I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

\_\_ F. By fax transmission

Based upon the written agreement of the parties to accept service by fax transmission or a court order, I faxed the documents(s) to the persons at the fax numbers listed below. The fax machine reported no error that I used. A copy of the record of the fax transmission is attached.

\_\_ G. By messenger

I served the documents(s) by placing them in an envelope or package addressed to the persons at the addresses listed below and providing them to a messenger for service. (A declaration by the messenger is attached)

I, JERI COPPA-KNUDSON, declare under penalty of perjury that the foregoing is true and correct.

DATED: November 1, 2010

/s/ Jeri Coppa-Knudson

JERI COPPA-KNUDSON, TRUSTEE